

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALFRIEDA SHEPARD, individually and on)	
behalf of all others similarly situated,)	
)	
Plaintiff,)	Case No. 1:16-cv-08288
)	
v.)	Honorable Jorge L. Alonso
)	
BMO HARRIS BANK, N.A., and)	Magistrate Judge M. David Weisman
KFORCE FLEXIBLE SOLUTIONS, LLC,)	
)	
Defendants.)	

**PARTIES' JOINT MOTION FOR PRELIMINARY APPROVAL
OF THE PARTIES' CLASS ACTION SETTLEMENT**

Plaintiff, Alfrieda Shepard, individually and on behalf of all others similarly situated, and Defendants BMO Harris Bank, N.A. and Kforce Flexible Solutions, LLC (collectively, the "Parties"), by their respective attorneys, move for the entry of an Order (1) granting preliminary approval of the Parties' proposed Settlement Agreement and Release; (2) approving as to form and content the Parties' proposed Notice of Proposed Settlement of Class Action Lawsuit, and approving the mailing of it to the Class Members; (3) approving Dahl Administration LLC as the Settlement Claims Administrator and preliminarily approving the costs of claims administration; (4) granting provisional certification of the proposed Class for settlement purposes only; (5) approving the Named Plaintiff as the Class Representative of the Class; (6) approving Plaintiff's Counsel as Class Counsel for the Class; and (7) setting a date for the Final Approval Hearing relating to the Settlement. In support of this motion, the Parties submit their Memorandum in support of the motion, and ask that the Court enter the proposed Preliminary Approval Order attached thereto as Exhibit 2.

Respectfully submitted,

ALFRIEDA SHEPARD

BMO HARRIS BANK, N.A.

By: /s/ Thomas M. Ryan
One of Her Attorneys

By: /s/ Daniel J. Fazio
One of Its Attorneys

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KFORCE FLEXIBLE SOLUTIONS, LLC

By: /s/ Michael D. Ray
One of Its Attorneys

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